

Message

From: Whittier, Robert [Robert.Whittier@doh.hawaii.gov]
Sent: 10/27/2017 6:32:27 PM
To: Pallarino, Bob [Pallarino.Bob@epa.gov]
Subject: Oil/Water Interface Measurement Requirements
Attachments: RedHill_GWProtectionPlan rev201409hdrRev01_pg_3-7.pdf; 2008_RedHill-GW-Protection-Plan_Table 4-2.pdf; 2017-07_Oil-Wtr_interface-Report.pdf

Bob,

Near as I can deduce the 2008 GWPP only requires monthly interface monitoring if an SSRBL is exceeded in RHMW01. I included Table 4-2 from the 2008 GWPP. The 2014 revision to the GWPP does specify monthly fuel product monitoring in all of the tunnel monitoring wells. However, I don't that GWPP has officially been accepted. The cover and page 3-7 from that plan are attached. The most recent Oil/Water Interface Report that I looked at only refers to doing that task in response to 2014 release (attached).

That said, I know that monthly interface measurements have been done since late January 2009. But I haven't found the regulatory requirement for that.

Does this help?

Thanks,
Bob W.